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FILE Federal Communications Curimission Office of the Secretary

Design for

December 18, 1991

Donna R. Searcy, Secretary Federal Communications Commission 1919 M Street, N.W. Room 222 Washington, DC 20554

RE: PETITION FOR RULE MAKING

Dear Ms. Searcy:

Please find enclosed one original and five copies of my comments on the above captioned matter. Sufficient copies are enclosed to insure each Commissioner receives a copy.

Respectfully submitted,

Deryl L. Crawford, N6AIN 5320 Centinela Ave. Apt. 7

Los Angeles Ca. 90066

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DEC 2 3 1991

Before the Federal Communications Commission Federal Communications Commission Washington, DC 20554

Office of the Secretary

In the Matter of: Amendment of Part 97 of the	> >	
Commission Rules Governing	>	Notice of
Amateur Radio Services	> RM-7869	Line Com
Regarding Repeater and	>	
Auxiliary Operation in the	>	
1.25 Meter Band	>	

To: The Commission

PETITION AGAINST RULE MAKING

I, Deryl L. Crawford N6AIN, hereby submit my request to the Federal Communications Commission to NOT take action on this Petition For Rule Making, as submitted by the American Radio Relay League.

There are some very important reasons why the Commission Should maintain its current position of allowing voluntary frequency coordination to prevail in the amateur 1.25 meter band. The American Radio Relay League (ARRL), in it's proposal, has managed to undermine the current Commission trend toward self regulation. If this rule is adopted it would needlessly displace thousands of active amateur operators currently using the 1.25 meter band in this countrie's metropolitan

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As the Commission knows, signals in the 1.25 meter band can only propagate for a distance of no more than 200 miles under the best of conditions. Therefore a station doing Weak Signal experiments in Albuquerque New Mexico would be unaffected by repeater operations in Los Angeles California. Similarly, a station in Flagstaff Arizona engaging in Earth Moon Earth (EME) communications with a station in Sacramento California would also not be affected by receater operations in the southern



It appears that voluntary coordination of amateur frequencies is an ideal mechanism to deal with this situation. Just as amateur astronomers are not bothered by city lights when viewing stars in the sky from distant mountain tops, so are Weak Signal and EME amateur radio operators in most parts of our country unaffected by spectrum overcrowding and repeater operations in the major metropolitan areas. Just as we would not expect the City of Los Angeles to turn out all of it's lights so a few amateur astronomers could use there telescopes from downtown L.A., we should not expect thousands of repeater operators to cease there operations altogether so a handfull of Weak Signal and EME operators can operate from the major metropolitan areas of our country.

I urge the Commission not to put itself into the job of frequency coordination but rather to let the current policy of voluntary frequency coordination stand. Do not act on RM-7869

Respectfully Submitted,

December 18, 1991

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